

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**KHIN SUH,**

*Plaintiff*

v.

**TYSON FOODS, INC., TYSON  
PREPARED FOODS, INC., TYSON  
FARMS, INC., AND TYSON**  
*Defendants.*

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**CIVIL ACTION NO. 4:19-cv-00409-O**

**PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES**

Plaintiff, Khin Suh, hereby files her written designation of the name and address of each expert witness who will testify at trial for the Plaintiff in compliance with this Court's Scheduling Order and in supplementation of all prior written discovery requests and Rule 26 disclosures requesting the identification of experts and persons with knowledge of relevant facts:

1. Jason English  
English Engineering Inc.  
543 William D Fitch Pkwy, Ste. 112  
College Station, TX 77845  
Phone: (979) 431-0702

Mr. English is a professional engineering consultant will offer testimony about workplace safety and ergonomics including Tyson's responsibility for causing Khin Suh's injury. Mr. English may also respond to issues raised by Defendants' expert testimony as necessary.

A copy of Mr. English's report, curriculum vitae, publications list, and previous testimony list are being served under separate cover.

2. Dr. Jason Marchetti  
Physician's Life Care Planning  
6505 W Park Blvd #155  
Plano, TX 75093  
Phone: (469) 458-6119

Dr. Marchetti is a Physical Medicine and Rehabilitation specialist who has practiced medicine in Texas since 2005. Dr. Marchetti is a Certified Life Care Planner who will offer testimony on Ms. Suh's physical and/or mental impairments and disability for the purpose of determining her care requirements and the costs of supplying her with requisite, medically-related goods and services throughout the probable duration of care. Dr. Marchetti may also respond to issues raised by Defendants' expert testimony as necessary.

A copy of Dr. Marchetti's report, curriculum vitae, publications list, and previous testimony list are being served under separate cover.

3. Thomas Roney  
3333 Lee Parkway, Ste. 600  
Dallas, Texas 75219  
(214) 665-9458

Mr. Roney is a consulting economist who will offer testimony on the economic loss to Khin Suh arising from her April 11, 2017 injury while working for Tyson including after-tax loss of past and future earning capacity, retirement benefits, and loss of past and future household services. Mr. Roney will also offer testimony on the value of the Life Care Plan prepared for Khin Suh by Jason Marchetti, MD of Physician's Life Care Planning. Mr. Roney may also respond to issues raised by Defendants' expert testimony as necessary.

A copy of Mr. Roney's report, curriculum vitae, publications list, and previous testimony list are being served under separate cover.

4. Dr. Scott Farley  
Dr. George Farley  
Dr. Arash Bidgoli  
Comprehensive Spine Center of Dallas  
1000 9th Avenue, Suite A  
Fort Worth, Texas 76104  
214-241-1427

Dr. Scott Farley is a doctor of osteopathic medicine who is treating Khin Suh for her April 11, 2017 injuries arising from her work for Tyson. Dr. Farley is expected to offer testimony on Khin Suh's injuries, and physical and mental condition, the cause of Khin Suh's injuries, her medical treatment in the past, her future medical treatment needs, Khin Suh's physical and mental disabilities, limitations, and impairments, including limitations on ability to work, her inability to administer to the needs of self and family and to attend to customary household duties and occupations, the effect of Khin Suh's injuries on her past and future earning capacity, her pain and suffering, the reasonableness and necessity of her past and future medical expenses and related care, and all other information contained in the medical records of Khin Suh. A summary of the facts and opinions to which the witness is expected to testify is contained in Dr. Farley's narrative report and clinical notes, and billing records, which are being served under separate cover, along with Dr.

Farley's curriculum vitae and publications list. Dr. Farley may also respond to issues raised by Defendants' expert testimony as necessary.

5. The following healthcare providers for Khin Suh:

Amazing Grace Home Health, and its doctors, nurses, and therapists  
383 Perry Avenue  
Lewisville, TX 75057  
972-436-5241

Baylor Scott & White All Saints Medical Center Fort Worth, and its doctors, nurses, and therapists  
1400 8<sup>th</sup> Avenue  
Fort Worth, TX 76104  
817-926-2544

Baylor Surgicare at Fort Worth, and its doctors, nurses, and therapists  
750 12<sup>th</sup> Avenue  
Fort Worth, TX 76104  
817-334-5100

Cardiovascular Home Care, and its doctors, nurses, and therapists  
7261 Hawkins View Drive  
Fort Worth, TX 76132  
817-847-8888

Century Integrated Partners, Inc./Diversified Health Care, and its doctors, nurses, and therapists  
P.O. Box 2168  
Edmond, OK 75083  
817-256-9434

Elite Medical Laboratory Solutions, LLC, and its doctors, nurses, therapists, technicians, personnel, and staff  
1101 Alma Street, Ste. 100  
Tomball, TX 77375

Fort Worth Orthopedics\Texas Health Physicians Group, and its doctors, nurses, and therapists, specifically including Dr. Mark Wylie and Troy Duley  
6301 Harris Parkway, Ste. 200  
Fort Worth, TX 76132  
817-433-3450

JPS Health Network, including JPS Hospital and all JPS clinics, and its doctors, nurses, and therapists, specifically including Dr. Amr Hegazi, Dr. Addie Boone, Dr.

Anupa Seth, Dr. Jipa Thomas, Shuang Chen, APRN, FNP, Dr. Sireesha Kolachalama, Maureen Joyner, APRN, NP, Dr. Daniel Roberts, Dr. Nicole Bigot, Dr. Margaret Conner, Lakeysha Ward, LPC, Dr. Leslie Smith, Dr. Richard Fulkerson, Samantha Thomas, PAC  
1500 S. Main Street  
Fort Worth, TX 76104  
817-921-3431

Metropolitan Area EMS Authority dba MedStar Mobile Healthcare, and its paramedics, nurses, therapists, and technicians  
2900 Alta Mere Drive  
Fort Worth, TX 76116  
817-923-3700

Midtown Medical Imaging/ Touchstone Imaging, and its doctors, nurses, therapists, technicians, personnel, and staff  
900 Jerome Street  
Fort Worth, TX 76104  
817-768-5317

Previa Medical Group of North Texas, and its doctors, nurses, and therapists, specifically including Dr. James Brezina, Jr., Dr. Stephen L. Brotherton, Dr. Christopher Pratt, and additional providers Thompson and Rangineni  
1651 W. Rosedale, Ste. 200  
Fort Worth, TX 76104  
817-335-4316

ProPath, and its doctors, nurses, therapists, technicians, personnel, and staff  
Dept. 41070, P.O. Box 660811  
Dallas, TX 75266-0811  
800-654-1888

Prostheticare DME, Fort Worth, LP, and its doctors, nurses, therapists, technicians, personnel, and staff  
7241 Howkins View Drive  
Fort Worth 76132  
817-336-8293

Radiology Associates of North Texas, and its doctors, nurses, therapists, technicians, personnel, and staff  
P.O. Box 1723  
Indianapolis, IN 46206-1723  
877-718-5728

Tarrant Pathology Associates, and its doctors, nurses, therapists, technicians, personnel, and staff  
P.O. Box 2627  
Fort Worth, TX 76113-2627  
877-340-5968

Texas Health Care, PLLC, and its doctors, nurses, and therapists, specifically including Dr. James Brezina, Jr, Dr. Stephen L. Brotherton, Dr. Christopher Pratt, and additional providers Thompson and Rangineni  
1651 West Rosedale, Ste. 205  
Fort Worth, TX 76104  
817-332-9966

Texas Health Harris Methodist Hospital Southwest Fort Worth, and its doctors, nurses, and therapists  
6100 Harris Parkway  
Fort Worth, TX 76132  
817-433-5000

US Anesthesia, and its doctors, nurses, therapists, technicians, personnel, and staff  
P.O. Box 660267  
Dallas, TX 75266  
844-812-2541

Vista Medical Group\Vista Physical Therapy, and its doctors, nurses, and therapists  
7668 McCart Ave.  
Fort Worth, TX 76133  
817-423-1621

The subject matter on which the witnesses are expected to present evidence is Plaintiff's injuries, and physical and mental condition, the cause of Khin Suh's injuries, her medical treatment in the past, her future medical treatment needs, Khin Suh's physical and mental disabilities, limitations, and impairments, including limitations on ability to work, her inability to administer to the needs of self and family and to attend to customary household duties and occupations, the effect of Khin Suh's injuries on her past and future earning capacity, her pain and suffering, the reasonableness and necessity of her past and future medical expenses and related care, and all other information contained in the medical records of Khin Suh. A summary of the facts and opinions to which the witnesses are expected to testify are contained in the providers' medical reports and records and billing records of Khin Suh which records are incorporated into this designation the same as if fully set forth at length for all purposes.

Such persons are listed only because of the specialized field of their knowledge, and Plaintiff should not be considered as vouching for their testimony or opinions, or their admissibility.

6. Plaintiff may also elicit testimony from one or more of the experts, if any, designated by Defendants in this case. Although persons designated by Defendants may not be Plaintiff's experts, Plaintiff reserves the right to call any and all experts identified by Defendants in this matter. This designation is made solely to comply with the rules and should not be construed to validate the opinions expressed by these experts. Presumably, the opinions of Defendants' experts are known by Defendants.

Respectfully submitted,

SMITH & SMITH

By: /s/ Daniel J. Smith  
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Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 16<sup>th</sup> day of March, 2020, a copy of the foregoing instrument was served upon the attorneys of record to the above cause, as follows:

**Via Email:**

zmayer@mayerllp.com  
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By: /s/ Daniel J. Smith  
Daniel J. Smith